

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION**

JANE DOE, by her next friend)
Anthony E. Rothert,)
Plaintiffs,)
v.) No. 2:19-cv-25 CDP
MICHELLE CHAPMAN, in her official) Currently a Sealed Matter
Capacity as Circuit Clerk of Randolph)
County, Missouri,)
Defendant.)

Protective Order

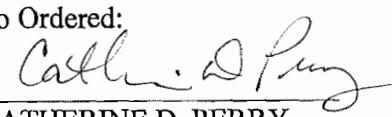
IT IS HEREBY ORDERED THAT:

1. Plaintiff's name and any information that has the potential to lead to the disclosure of her identity, including but not limited to her initials, age, birth date, city of residence, place of residence, physical characteristics, dates of pregnancy, personal property, family members or other associates, or information about her schooling or employment or lack of schooling or employment is designated as "Confidential Information."
2. Defendant, including her agents and employees, shall not disclose Confidential Information to any person other than this Court, including that they shall not disclose any Confidential Information as part of any response to any request for public records.
3. Defendant, including her agents and employees, shall affirmatively take reasonable steps to ensure that no Confidential Information is included in a response to any request for public records or is otherwise disclosed to any person other than this Court.
4. Confidential Material in paper format shall be retained only in the custody of counsel of record, who shall be responsible for restricting disclosure in accordance with the

provisions of this Order. Specifically, counsel of record shall retain all Confidential Material in paper format within the confines of his/her personal offices except as necessary to conduct the present litigation. Confidential Material in electronic format shall be provided to counsel of record and not provided to any other person during the course of this litigation.

5. If it becomes necessary for Defendant to submit Confidential Material, or anything that might arguably be Confidential Material, to the Court in connection with any filings or proceedings in this litigation, except under exceptional circumstances Defendant shall provide a copy to Plaintiff 48 hours in advance for the purpose of agreeing upon redactions. If exceptional circumstances exist that prevent Defendant from providing a copy of a filing that arguably contains Confidential Material, Defendant shall move the Court to accept the filing under seal until such time as redactions may be agreed upon.
6. Upon final conclusion of this litigation, Defendant shall destroy any Confidential Material disclosed during the course of this litigation.
7. This Order may be modified only by further Order of the Court.
8. The termination of proceedings in this action shall not relieve any person to whom Confidential Material has been disclosed from the obligations of this Order, unless the Court orders otherwise.

So Ordered:


CATHERINE D. PERRY
UNITED STATES DISTRICT JUDGE

Dated this 9th day of July, 2019.